BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2020-63-E

IN RE:	)	
	)	
Petition of Bridgestone Americas Tire Operations, LLC for an Order Compelling Dominion Energy South Carolina, Inc. to Allow the Operation of a 1980 kW AC Solar Array	)	**DOMINION ENERGY SOUTH CAROLINA, INC.'S RESPONSE IN OPPOSITION TO MOTION TO STRIKE**

Pursuant to S.C. Code Ann. Reg. 103-829, Dominion Energy South Carolina, Inc. ("DESC") submits its Response in Opposition to Motion to Strike to the Public Service Commission of South Carolina (the "Commission") in the above-captioned matter.

INTRODUCTION

Bridgestone Americas Tire Operations, LLC's ("BATO") Petition (the "Petition") seeks an order from the Commission (i) exempting BATO's 1,980 kilowatt ("kW") alternating current ("AC") solar array (the "Generating Facility") from Commission Order No. 2016-191, which approved the South Carolina Generator Interconnection Procedures, Forms, and Agreements (the "South Carolina Standard"), or (ii) waiving application of the South Carolina Standard and allowing BATO to immediately operate the Generating Facility in parallel with the DESC system. As more fully set forth in DESC's Prehearing Brief, filed July 21, 2020, BATO's request to proceed without study and regulation is not only dangerous for the operation of the Generating Facility, it sets a dangerous precedent as well.

The Petition was filed on February 14, 2020. On May 7, 2020, the Hearing Officer in the above-referenced docket set a procedural schedule for this docket in Order No. 2020-37-H.

Pursuant thereto, DESC submitted its prefiled direct testimony on June 30, 2020, and its prefiled surrebuttal testimony two weeks later on July 14, 2020.

After all of the prefiled testimony was submitted in this docket by BATO and DESC, on July 17, 2020—and over two weeks after DESC submitted its direct testimony—BATO filed a Motion to Strike (the "Motion"). The Motion seeks to strike certain portions of DESC's prefiled testimony and keep such evidence from presentation to the Commission. In particular BATO seeks to hide from the Commission:

- Testimony regarding the Office of Regulatory Staff's ("ORS") review of BATO's request and application of the South Carolina Standard to the Generating Facility.
- A letter filed by the South Carolina Solar Business Alliance (the "SCSBA Letter") in this proceeding which urges the Commission to "not impair or discriminate against solar facilities that currently reside in the interconnection queue."[1]
- Testimony of the technical opinion and regular application of regulations by DESC engineers.

BATO blatantly mischaracterizes and contorts DESC's testimony to avoid introduction of evidence at a hearing that would inform the Commission's determination in this matter and the Commission's regulation of the industry. Contrary to the arguments set forth in the Motion, the Commission is not like any other jury because the Commission is considered an expert and, in that role, is able to give appropriate weight to the evidence.[2] Because of this, and for the reasons set forth below, the Commission should receive the referenced evidence in this matter and the Motion should be denied.

STANDARD OF REVIEW

The South Carolina Rules of Evidence are permissive and provide that all evidence that has "any tendency to make the existence of any fact that is of consequence to the determination of

[1] SCSBA Letter at 2.
[2] *See, e.g.*, *Hamm v. South Carolina Public Service Com'n*, 422 S.E.2d 110 (S.C. 1992).

the action more probable or less probable than it would be without the evidence" is relevant and admissible.[3] This is especially true in administrative proceedings where the risk of improper consideration by a jury is not at issue. That is, the Commission is comprised of individuals with unique experience and knowledge of precisely the matters it entertains, whereas a jury is comprised of lay persons who typically have no such expertise.[4] As such, the dangers of improper consideration, undue influence, and improper bias due to evidence introduced into the record in proceedings before the Commission are reduced. Indeed, in order to create a complete record "motions to strike are disfavored in administrative proceedings" such as the instant matter.[5]

By admitting all relevant testimony, the Commission, in its determination, may give the testimony "whatever weight or credibility the Commission deems appropriate" in light of the entire record.[6] Furthermore, unlike a jury, the Commission is also charged with determining resolutions that will impact the entire energy market including utilities, developers, and rate payers and should consider evidence concerning the market impact.

RESPONSE TO BATO'S EFFORT TO AVOID EVIDENCE IN THE RECORD

I. DESC WITNESS RAFTERY'S TESTIMONY SHOULD BE ADMITTED IN ITS ENTIRETY.

A. DESC Witness Raftery's Testimony Does Not Disclose Confidential Settlement Negotiations.

DESC Witness Raftery's testimony regarding pre-suit discussions between DESC and BATO, as well as discussions that included the ORS, simply does not detail the confidential

[3] SCRE Rule 401 and Rule 402.
[4] *See id*.
[5] *See* Order No. 2015-5-H(A) issued in Commission Docket No. 2014-372-T on January 22, 2015; *see also Brian Hunter*, 137 FERC 61146, 18 (2011).
[6] Commission Order No. 1999-690 issued in Commission Docket No. 1999-259-C on October 4, 1999.

settlement discussions that Rule 408 of the South Carolina Rules of Evidence ("SCRE") seek to protect. For ease of reference, the rule is repeated in its entirety, below:

> Evidence of (1) furnishing or offering or promising to furnish, or (2) accepting or offering or promising to accept, a valuable consideration in compromising or attempting to compromise a claim which was disputed as to either validity or amount, is not admissible to prove liability for or invalidity of the claim or its amount. Evidence of conduct or statements made in compromise negotiations is likewise not admissible. This rule does not require the exclusion of any evidence otherwise discoverable merely because it is presented in the course of compromise negotiations. This rule also does not require exclusion when the evidence is offered for another purpose, such as proving bias or prejudice of a witness, negativing a contention of undue delay, or proving an effort to obstruct a criminal investigation or prosecution.
>
> (emphasis added).

In interpreting Rule 408, South Carolina courts have time and again noted that the fundamental principle underlying the rule is that "compromises are favored and evidence of an offer or attempt to compromise or settle a matter in dispute cannot be given in evidence against the party by whom such offer or attempt was made."[7] However, evidence may be admitted where the evidence in question does not disclose statements or discussions made in "manifest contemplation of a compromise and with a view toward mutual concessions."[8]

Indeed, DESC Witness Raftery's testimony completely lacks any evidence of negotiations or discussions with BATO that show an attempt to compromise or mutually concede anything. Rather, the following statements from DESC Witness Raftery's testimony evidence a repeated and consistent position by DESC that the South Carolina Standard applies to the Generating Facility:

- At these meetings and through various correspondence in between, BATO advanced a similar argument that it now places before the Commission—neither the South Carolina Standard nor applicable FERC regulations apply to the Generating Facility. As it relates to the South Carolina Standard, BATO argued it is inapplicable because the Generating Facility does not sell power and it solely supplies BATO's facility.[9]

[7] *Hunter v. Hyder*, 114 S.E.2d 493, 497 (S.C. 1960).
[8] *Hall v. Palmetto Enterprises II, Inc., of Clinton*, 317 S.E.2d 140, 143 (S.C. App. 1984).
[9] Raftery Direct Testimony 7:22 – 8:5, June 30, 2020.

- At the meeting, BATO again re-iterated its position to DESC and the ORS that the South Carolina Standard was inapplicable and noted that it already purchased the panels for the Generating Facility prior to obtaining an interconnection agreement. In response, DESC echoed the position outlined in the testimony submitted in this docket—that the Generating Facility is subject to the South Carolina Standard and DESC cannot treat BATO in a preferential manner in violation of the South Carolina Standard by studying BATO's interconnection request out of queue sequence.[10]

- However, BATO refused then, and continues to refuse now, to acknowledge that the Generating Facility falls squarely within the jurisdiction of the South Carolina Standard.[11]

This testimony is not a secret. BATO fundamentally mischaracterizes the nature of the discussions between BATO and DESC by claiming they were "confidential settlement negotiations."[12] Clearly, DESC Witness Raftery's testimony does not represent two parties attempting to compromise or "meet in the middle." Instead, it evidences parties that time and again advanced the same respective positions that are echoed throughout the documents filed in this docket. Nowhere in DESC Witness Raftery's testimony does he detail an exchange of proposed mutual concessions or an attempt by either party to compromise their position. By contrast, the testimony BATO threatens to introduce in its Motion related to purported "concessions" offered by DESC is precisely the type of testimony that would be excluded from the record, and DESC firmly objects to such a clear violation of these rules—especially when the Motion already toes-the-line in offering it up as improper testimony.

Likewise, the discussions among BATO, DESC, and the ORS were not "confidential settlement discussions" given that these discussions occurred during a specially-convened meeting held by the ORS so that the ORS could provide the parties with its guidance on the matter after reviewing the details of the Generating Facility and concluding its investigation arising from the Utility Services Request. Indeed, the ORS—a third party—was present at the meeting on June 26,

[10] Raftery Direct Testimony 10:22 – 10:29, June 30, 2020.
[11] Raftery Direct Testimony 11:9 – 11:11, June 30, 2020.
[12] Motion at 3.

2018 and received substantial details as to the configuration of the BATO facility, the Generating Facility, and the DESC system pursuant to a Utility Services Request submitted by DESC prior to the meeting with BATO and the ORS. To expressly characterize any discussions between the ORS, BATO, and DESC as "confidential" for the purpose of striking the same from the record is simply a mischaracterization by BATO that finds no basis in reality.

Even if DESC Witness Raftery's testimony somehow amounted to a description of settlement discussions, it would still be admissible under Rule 408 because it is not meant to "prove liability for or invalidity of [BATO's] claim." Indeed, nowhere in the testimony at issue does DESC Witness Raftery outline statements by BATO in these discussions in order to leverage such statements to show that BATO actually believes the South Carolina Standard applies. Rather, DESC Witness Raftery's testimony serves a variety of other purposes. For example, DESC Witness Raftery's testimony serves to refute the implication in the Petition as well as BATO's direct testimony that DESC has been anything but steadfast in its application of the South Carolina Standard since the interconnection application was submitted by establishing multiple discussions since 2018 in which DESC relayed the same, consistent application of the South Carolina Standard to BATO.

B. DESC Witness Raftery's Testimony Regarding Discussions Among BATO, DESC, And The ORS Does Not Contain Hearsay.

As an initial matter, the Motion blatantly mischaracterizes the foundation upon which the evidence is introduced—DESC Witness Raftery's personal knowledge. The Motion states that "Witness Raftery concedes that he was not present during the negotiations with ORS."[13] This completely ignores the following express language in DESC Witness Raftery's direct testimony:

Q. WHEN DID THE PARTIES HOLD THE MEETING?

[13] *Id*.

A. On June 26, 2018, DESC, BATO, and the ORS met at the BATO facility.

Q. DID YOU ATTEND THAT MEETING ON BEHALF OF DESC?
A. Yes, I did attend the meeting at the BATO facility.[14]

DESC Witness Raftery clearly states on the record that he was present at the meeting and will testify as such. This means that BATO either did not read this portion of DESC Witness Raftery's testimony, or intentionally mischaracterized the same. In fact, the Motion contorts DESC Witness Raftery's testimony even further. For example, the Motion states that:

> Witness Raftery concedes that he was not present during the negotiations with ORS, testifying that 'it is my understanding that BATO reached out to the ORS' and 'that it is my understanding that the ORS informed both parties of its position.'[15]

In each case, the Motion "hides the ball" by taking only portions of complete sentences in DESC Witness Raftery's testimony to form a non-specific reference that BATO utilized to apply, incorrectly, to the ORS meeting. To be clear, the portions of testimony cited by BATO do not reference the meeting with the ORS, which was to review the results of its investigation arising from the Utility Services Request. To illustrate this point, the portions of DESC Witness Raftery's testimony are cited below—in full—to highlight precisely how BATO contorted Witness Raftery's statements and misapplied the same. The portions quoted in the Motion are underlined:

- Yes, the ORS has been involved throughout this process in hopes that the parties could find resolution prior to filing with the Commission. In fact, <u>it is my understanding that BATO reached out to the ORS</u> regarding this dispute in May of 2018—only a few months after submitting the interconnection request for the Generating Facility.

- <u>It is my understanding that the ORS informed both parties of its position</u> prior to the meeting.

Clearly, these portions of testimony, when taken as they actually appeared, show that DESC Witness Raftery was very clear in referring to events prior to the meeting with the ORS on June

[14] Raftery Direct Testimony 10:4 – 8, June 30, 2020.
[15] Motion at 3.

26, 2018. Parsing these two sentences was deliberate and intentional. Regardless, DESC Witness Raftery attended the meeting with the ORS and has personal knowledge of the same upon which to base his testimony.

DESC Witness Raftery's testimony regarding the meeting and corresponding discussions with the ORS is not hearsay because it was not entered into the record to prove the truth of the matter asserted. Rather, DESC Witness Raftery's testimony concerns not whether the ORS's belief that the South Carolina Standard should govern the Generating Facility is true, but rather offered for the impact that DESC's understanding of ORS's position had on DESC's engagement with BATO from that point on.

Additionally, it is unclear why BATO seeks to hide DESC Witness Raftery's testimony on a well-known fact in this dispute—that the ORS reviewed this dispute, which included sending a Utility Services Request, dated May 29, 2018, to DESC as a result of BATO's outreach to the ORS. Testimony regarding the impact of that review on DESC can and should be presented to the Commission—especially when BATO challenges the reasonableness of DESC's behavior. The appropriateness of this evidence is underscored by the fact that the parties as well as the Commission may examine witnesses for BATO and DESC under oath on the matters raised and the Commission can determine the probative value.

C. The ORS Letter Offered By BATO As An Exhibit To The Motion Does Not Contradict DESC Witness Raftery's Testimony.

BATO boldly states that DESC Witness Raftery's testimony concerning his belief that the ORS issued guidance on this dispute that was consistent with DESC's position is "incorrect" and points to a letter from the ORS, dated September 27, 2019 (the "ORS Letter"), to supposedly undercut DESC's position. The letter, however, does not contradict or render DESC Witness Raftery's testimony incorrect in any way. Specifically, the ORS Letter simply indicates that the ORS "does not have the authority or jurisdiction to provide a binding opinion as to whether the

[South Carolina Standard]" apply to the Generating Facility.[16] To be clear, DESC has never asserted that the ORS's opinion could bind either party or the Commission, only that the ORS did in fact issue guidance to DESC and BATO. Apparently acknowledging this fact, the Motion is careful to state that the "ORS has taken no position in this docket."[17] Again, DESC never asserted that the ORS took a binding position, nor did DESC ever assert that the ORS took a binding position in this docket. BATO continues its campaign of mischaracterizations.

Regardless, the Commission is well within its capacity to accept evidence of DESC Witness Raftery's impression and give it the appropriate weight. Although BATO may be disappointed that the ORS has not expressed support for its decision, that is simply not a sufficient basis upon which to exclude this testimony. This is simply another attempt by BATO to completely discredit DESC Witness Raftery, even implying that his testimony is completely false.[18] To be clear, DESC is in possession of items supporting DESC Witness Raftery's testimony regarding his understanding of the guidance issued by the ORS. DESC should be permitted to provide the Commission with relevant evidence in this matter for the Commission's evaluation and BATO's attempt to contort DESC's testimony should be denied.

II. THE SCSBA LETTER IS RELEVANT, ADMISSIBLE EVIDENCE FILED IN THIS DOCKET AND DESC TESTIMONY REGARDING THE SAME SHOULD BE ADMITTED IN ITS ENTIRETY.

The testimony of DESC Witness Raftery and DESC Witness Xanthakos related to the SCSBA Letter is not hearsay because the testimony was not advanced to "prove the truth of the matter asserted."[19] Rather, the SCSBA letter was introduced by DESC Witness Raftery and Xanthakos informs the basis for DESC's belief that the Commission's decision in this docket

[16] Motion, Exhibit 1 (emphasis added).
[17] *Id*. at 5 (emphasis added).
[18] *See id*. at 4 ("Witness Raftery has no personal knowledge of the matters asserted and is not competent to testify to the ORS' [sic] statements, if the statements were ever made").
[19] SCRE Rule 801(c).

would create industry-wide precedent with long-term effects on development in the state of South Carolina. Therefore, DESC cannot view the Generating Facility in isolation and must necessarily consider the effects that such a decision would have on the hundreds of other projects in DESC's interconnection queue. Again, BATO acts contrary to its own objections by opining about the SCSBA's state of mind in the Motion, noting that the "SCSBA could not have anything supportive to say of DESC's labyrinthine and arbitrary interconnection procedures and with remarkable restraint, SCSBA fails to even mention DESC in its correspondence."[20] Despite being wildly speculative and contrary to its own argument, BATO mischaracterizes the South Carolina Standard as a creature conjured up by DESC to "hide the ball" from developers. To the contrary, the South Carolina Standard was approved by the Commission to engender a non-discriminatory, fair interconnection process that ensured safety and reliability.

Additionally, the rules against hearsay are meant to ensure the veracity of testimony by excluding out-of-court statements from the fact-finder. However, far from the "rank hearsay" decried by BATO, the SCSBA Letter was submitted in this very docket, and the Commission is able to take judicial notice of the same, regardless of whether DESC ever mentioned it in testimony or otherwise.[21] As such, the contents of the SCSBA Letter are not in dispute and BATO failed to object to the SCSBA Letter at the time it was filed on April 29, 2020, or seek to have it stricken from the administrative record.[22]

This is simply another outright mischaracterization by BATO—one in which it provides speculative opinions and attempts to supplement its own testimony without prior permission from

[20] Motion at 6.
[21] *See* S.C. Code Ann. Reg. 103-846; *IN RE: Application of Carolina Water Service, Inc. for Adjustment of Rates and Charges and Modification to Certain Terms and Conditions for the Provision of Water and Sewer Service*, 2018 WL 2365702 (S.C.P.S.C. 2018) (taking judicial notice of docket files).
[22] Even if the SCSBA Letter does constitute hearsay, there are two avenues by which DESC can introduce this evidence into the record given that it falls squarely within the business record and public record exceptions to the hearsay rule. *See* SCRE 803.

the Commission. Therefore, DESC's testimony regarding the SCSBA's letter should be admitted in its entirety given that it is not hearsay and the SCSBA letter was submitted in this very docket.

III. DESC'S TESTIMONY DOES NOT CONTAIN IMPROPER LEGAL CONCLUSIONS AND SHOULD BE ADMITTED IN ITS ENTIRETY.

The testimony of DESC Witness Raftery, DESC Witness Hammond, DESC Witness Furtick, and DESC Witness Xanthakos is based upon personal knowledge, is relevant to this proceeding, and is admissible as opinion testimony of lay witnesses according to the Commission's own precedent. The Commission can and should fairly hear this evidence. As such, all such testimony should be admitted in its entirety.

BATO repeatedly cites the dangers arising to a "jury" if such testimony was admitted given that it is offered by "lay witnesses." However, BATO omits a critical distinction here—the Commission is akin to a jury of experts.[23] As such, the Commission views SCRE Rule 702 as permissive, and has held that "this rule does not bar opinion testimony by lay witnesses."[24] The Commission "is entitled to hear testimony and give that testimony whatever weight it deems appropriate during the courts of the hearing."[25] The Commission may hear such testimony if it is "reasonable and prudent" to do so.[26] Additionally, SCRE Rule 702 makes clear that "[t]estimony in the form of an opinion or inference otherwise admissible is not objectionable because it embraces an ultimate issue to be decide by the trier of fact."[27]

Here, the case revolves, almost exclusively, around DESC's interpretation and application of the South Carolina Standard. DESC is tasked by the Commission with applying and interpreting the South Carolina Standard to generators that interconnect and operate in parallel on the DESC

[23] *See, e.g.*, *Hamm* (S.C. 1992).
[24] Commission Order No. 2009-104 issued in Commission Docket No. 2008-196-E on February 27, 2009.
[25] *Id*.
[26] *Id*.
[27] SCRE Rule 702.

system, just like the Generating Facility. The above-referenced witnesses offered by DESC have personal knowledge of the South Carolina Standard and DESC's application of the same, along with DESC's administration of its retail contracts given that the witnesses either (i) participated in the development of the South Carolina Standard, (ii) implement the South Carolina Standard on a regular basis on behalf of DESC, or (iii) administer the BATO electric service contract. As such, these witnesses do not present "legal conclusions" regarding the South Carolina Standard, but instead provide details of DESC's day-to-day application and interpretation of the South Carolina Standard and the electric service contract—precisely the issues in dispute. Given the technical nature of the South Carolina Standard's provisions related to "interconnection and parallel operation"—the very provisions cited by BATO in the Petition—DESC must necessarily present DESC Witness Hammond, DESC Witness Furtick, and DESC Witness Xanthakos given that they are licensed professional engineers that interpret and apply the South Carolina Standard on a daily basis. As such, their testimony, along with DESC Witness Raftery's—who participated in the development of the South Carolina Standard—is relevant and will assist the Commission in this case given that BATO put these precise matters at issue. To now object to DESC rebutting the very claims BATO set forth regarding DESC's application of the South Carolina Standard and the electric service contract is puzzling, especially given that BATO's testimony is rife with similar testimony:

- BATO Witness Freeman testifies that "BATO's Solar Array is not subject to the [South Carolina Standard]."[28]
- BATO Witness McGavran boldly claims that:
    - "[A]ll Public Service Commission requirements and utility requirements that would apply to parallel operation of a solar or distributed generation resource do not apply to this situation;"[29]

[28] Freeman Direct Testimony 4:6, June 9, 2020.
[29] McGavran Direct Testimony 7:22 – 8:1, June 9, 2020.

- "BATO has complied with its contract for electric service with DESC;"[30] and
- "Therefore, BATO's solar array is not subject to the interconnection process or the [South Carolina Standard].[31]

The Commission's consideration of this testimony is reasonable and prudent given that (i) these witnesses testify to the very issues in dispute and (ii) the Commission's own precedent permits the consideration of this testimony given that the Commission is akin to a jury of experts. As such, the testimony at issue should not be stricken from the record and DESC should have the opportunity to introduce it into evidence at the upcoming hearing.

CONCLUSION

The Motion is simply another effort by BATO to mischaracterize DESC's position into something it is not such that it can recoup on its investment in the Generating Facility. The Motion completely and conspicuously lacks any mention of established precedent that the Commission is an expert fact-finder, conveniently comparing the Commission's ability to consider evidence to that of a jury of laypersons. The evidence proffered by DESC is proper for Commission consideration because it is relevant, based on personal knowledge, and not hearsay. Additionally, BATO should not be granted an opportunity to supplement its testimony given that it submitted rebuttal testimony in this docket. BATO did not take the opportunity to address these items in its testimony then, and it should not be granted reprieve by the Commission to hide them now. However, if the Motion is granted, DESC respectfully requests an opportunity to supplement its testimony in this docket to address BATO's additional testimony. For these reasons, and for those set forth above, the Motion should be denied.

Respectfully Submitted,

[30] McGavran Direct Testimony 11:9, June 9, 2020.
[31] McGavran Rebuttal Testimony 2:25 – 26, July 7, 2020.

s/ J. Ashley Cooper
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Cayce, South Carolina

This 27th day of July, 2020.

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2020-63-E

IN RE: Petition of Bridgestone Americas Tire Operations, LLC for an Order Compelling Dominion Energy South Carolina, Inc. to Allow the Operation of a 1980 kW AC Solar Array	**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served on this day one (1) copy of **Dominion Energy South Carolina, Inc.'s Response in Opposition to Motion to Strike** via electronic mail and U.S. First Class Mail upon the persons named below, addressed as follows:

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s/ J. Ashley Cooper

This 27th day of July, 2020.